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OF COUNSEL

April 12, 1990

Steven J. Calder
USEPA
Waste Management Division
JFK Federal Building HSN-CAN5
Boston, MA 02203

Superfund Records Center
SITE: Coakley
BREAK: 119
OTHER:

Re: Coakley Landfill - Information Request

Dear Mr. Calder:

This letter responds to EPA's requests for information contained in Attachment A of the Notice Letter sent to Coakley Landfill PRPs on February 2, 1990.

Attachment A

1. Describe any knowledge you or your company have of the disposal of any industrial waste or liquid waste at the Site by you, your company, or any other person or entity after or before regular business hours. Give the name and current address of any persons who might have knowledge of any such disposal.

The City is aware of rumors from various sources to the effect that after-hours dumping took place at Coakley. At present the City has been unable to substantiate these claims.

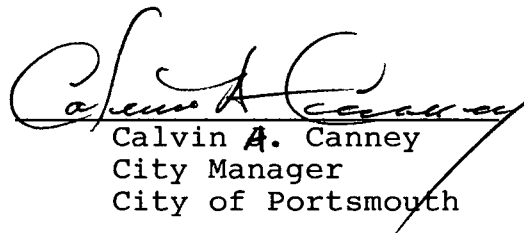
2. Describe any waste disposal activity of Keefe Environmental at the Site from 1972 to 1985 and any business relationship between the Site and Keefe Environmental Services, Inc. during that period. Submit any documentation which relates to such activity or relationship with Keefe Environmental Services, Inc. Give the name and current address of any persons who might have knowledge of such activity or relationship.

The City believes that Paul Keefe and/or Keefe Environmental Services disposed of liquid hazardous waste at Coakley Landfill, based on the following facts:

- a. Weight slips from the Landfill list Keefe.
- b. Entries numbered 1859 and 2445 in the probable log book list "Keefe". See attached copies.
- c. In a letter to Portsmouth City Manager Canney dated April 24, 1979, Ronald Coakley complained that a company believed to be Case (sic) Environmental deposited barrels containing harsh chemicals in the landfill. A subsequent conversation with Coakley, documented in the margins of that letter, revealed that the barrels had been brought in covered over with rubbish, and that Dan Ayer of the City Yard would contact Keefe Trucking and advise them that they would not be allowed to dump there if they pulled another "stunt" like that. A copy of the letter is attached.
- d. Rex Lambert REDACTED - PERSONAL PRIVACY saw drums containing liquid waste in Paul Keefe's truck. Keefe stated to Lambert that the drums were from the Portsmouth Naval Shipyard, and that he was taking them to the Coakley Landfill.
- e. Over a one-month period in the early 1970s Paul Keefe dumped approximately twelve 55-gallon drums of liquid waste per week at the site, according to former Coakley employee Norman Lord REDACTED - PERSONAL PRIVACY
REDACTED - PERSONAL PRIVACY
- f. Former Coakley employee Lionel Martel REDACTED - PERSONAL PRIVACY REDACTED - PERSONAL PRIVACY recalls that drums containing liquid waste were brought into the Landfill by a man named Keefe sometime prior to 1976.
- g. In the 1976-1977 contract year, Keefe Environmental Services had the sole refuse contract with Pease Air Force Base to remove rubbish from the housing areas of the base. During that period, Pease was a participant in the Coakley Landfill Agreement and authorized to dispose of all its rubbish at the site. See attached document.

- h. Between 1977 and 1980, Pease Air Force Base entered into seven (7) contracts with Keefe Environmental Services to remove industrial waste. The City believes that some of this industrial waste was taken to the Coakley Landfill. See attached document.
- i. Keefe customers in the Seacoast area in the 1970s included the Portsmouth Naval Shipyard, Pease Air Force Base, Data General, Davidson Rubber, Clarostat Manufacturing Company, GTE Products Corp., C.H. Sprague & Son Co., Sprague Electric Company, and Palmer-Chenard Industries, Inc. The City believes that hazardous waste generated by these organizations may have been taken to the Coakley Landfill.
- j. The City has been unsuccessful in its efforts to interview Paul Keefe and believes that EPA should arrange to interview Mr. Keefe.

Dated: April 12, 1990

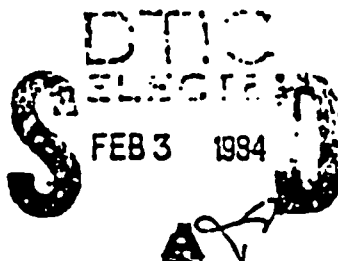

Calvin A. Canney
City Manager
City of Portsmouth

JTA/ams
Enclosures

AD-A 137 493

INSTALLATION RESTORATION PROGRAM RECORDS SEARCH

For
Pease Air Force Base, New Hampshire



This document has been approved
for public release and its
distribution is unlimited.

Prepared for

AIR FORCE ENGINEERING AND SERVICES CENTER
DIRECTORATE OF ENVIRONMENTAL PLANNING
TYNDALL AIR FORCE BASE, FLORIDA 32403
AND
STRATEGIC AIR COMMAND
DIRECTORATE OF ENGINEERING AND ENVIRONMENTAL PLANNING
OFFUTT AIR FORCE BASE, NEBRASKA 68113

JANUARY 1984

84 02 03 069

PEASE AFB INDUSTRIAL WASTE DISPOSAL CONTRACTS

1. KNOWN CONTRACTS:

<u>DATE</u>	<u>AMOUNT</u>	<u>MATERIAL</u>	<u>CONTRACTOR</u>
JUN 82	12-55 GAL DRUMS	WASTE PENETRATING OIL	COATING SYSTEMS, INC.
JUN 82	1210 GALS	PAINT THINNERS	RESOURCE CONSERVATION RECOVERY AGENCY
JUN 81	400 GALS	DETERGENT AND WATER	RESOURCE CONSERVATION RECOVERY AGENCY
APR 81	880 GALS	PAINT THINNERS	RESOURCE CONSERVATION RECOVERY AGENCY
AUG 80	3-55 GAL DRUMS	SOLVENT	KEEFE ENVIRONMENTAL SERVICES, INC.
AUG 80	3-55 GAL DRUMS	SOLVENT, THINNERS	KEEFE ENVIRONMENTAL SERVICES, INC.
JUN 80	11-55 GAL DRUMS	THINNERS, PAINT, SLUDGE	KEEFE ENVIRONMENTAL SERVICES, INC.
JUN 80	4-55 GAL DRUMS	OIL	KEEFE ENVIRONMENTAL SERVICES, INC.
OCT 79	UNKNOWN (FROM SEPARATOR)	SOLVENTS, FUEL	ATC PETROLEUM
AUG 79	25-55 GAL DRUMS	SOLVENTS	KEEFE ENVIRONMENTAL SERVICES, INC.
AUG 79	2-55 GAL DRUMS	OILS	KEEFE ENVIRONMENTAL SERVICES, INC.
APR 78	22-55 GAL DRUMS	THINNERS, SOLVENTS, SLUDGE	RECYCLING INDUSTRIES
NOV 77	300 GALS	SOLVENT AND OIL WASTE	KEEFE ENVIRONMENTAL SERVICES, INC.
OCT 77	1000 GALS	TCE, SILICONE FLUID	RECYCLING INDUSTRIES
SEP 77	22-55 GAL DRUMS	PAINT THINNERS	RECYCLING INDUSTRIES
AUG 77	UNKNOWN (FROM SUMP)	INDUSTRIAL WASTE SLUDGE	BEEDE

PEASE AFB REFUSE CONTRACTS

<u>DATES</u>	<u>SCOPE</u>	<u>CONTRACTOR</u>
1960-1963	BASE	H. E. BOUFFARD AND COMPANY
1977-1983	HOUSING	COASTAL ENVIRONMENTAL
1975-1980	BASE	SEACOAST TRUCKING
1976-1977	HOUSING	KEEFE ENVIRONMENTAL SERVICES
1975-1976	HOUSING	SEACOAST TRUCKING

603-436-4245
or 436-0520

480 BREAKFAST HILL ROAD
GREENLAND, N, H, 03840

GENERAL CONTRACTORS

April 24, 1979

Mr. Calvin Canney, City Mgr.
126 Daniel St.
Portsmouth, NH 03801

Re: Coakley Landfill, Inc.

Dear Mr. Canney:

I am forced to bring your attention particularly to paragraph #8 of the Agreement between City of Portsmouth, Town of North Hampton, and Patrick J. Coakley. I am referring to the list of residents and businesses whose wastes are being picked up by local contractors. Recent violation of the Landfill regulations prompts me to request such a list.

On April 23, 1979 at 2:00 p.m. a company which we believe to be Case Environmental deposited some barrels containing harsh chemicals in the Landfill. If the city is going to allow actions of this nature to continue, I am releasing myself of any responsibilities arising from the situation.

It is specifically stated in the Agreement which cities and towns have dumping privileges in Landfill. I feel the city man employed to control traffic going into Landfill should be informed of all authorized waste haulers, and their contents, so that we may avoid instances like this in the future.

I am confident you will take immediate action on this matter and inform me of what measures will be taken.

Sincerely,

Ronald C. Coakley
President

cc: Jeremy Waldron
Dan Ayer, City Yard

RL | RAY LABRIE INVESTIGATIVE SERVICES

P.O. Box 5152 • Portsmouth, NH 03801
(603) 433-4424

March 14, 1990

**COAKLEY LANDFILL - NO. HAMPTON, NH
RE: PAUL KEEFE CONNECTION**

On January 18, 1990, I began an investigation regarding the Coakley Landfill. This was done on behalf of the City of Portsmouth, NH, through the specific request of City Attorney Robert P. Sullivan.

On March 12, 1990, during a telephone review with Attorney John Alexander, who represents the interests of Portsmouth in this matter, I was asked to document any of my findings thus far, which would involve Mr. Paul Keefe with the Coakley Landfill operation. This report is specific as to what has been learned in that regard.

On January 30, 1990, I interviewed Mr. Rex Lambert, who now resides on REDACTED - PERSONAL PRIVACY REDACTED - PERSONAL PRIVACY REDACTED - PERSONAL PRIVACY. Mr. Lambert had a keen interest in the Landfill, whereas he owned considerable properties, land and buildings, on Lafayette Terrace and Route 1 in North Hampton.

After it was learned that chemical pollution had occurred on his properties, he sold them in 1985/6. Buyers included Kenneth J. French who now owns several small businesses on Lafayette Terrace and Rod Booker, who owns and operates, "Booker's Auto Repair & Body Shop", on Route 1. Because of his distress over the land pollution from the Landfill, Lambert dedicated a full year and 50 to 60 thousand dollars of his own money to deal with that situation. Along with Ruth Martin and Lilian Wylie, he was a dedicated activist in this matter.

Mr. Lambert stated that Paul Keefe was hauling hazardous waste from the Portsmouth Naval Shipyard to the Coakley Landfill prior to 1975. I asked how he knew this. Lambert stated that he owned a service station on Islington St. near downtown Portsmouth. He said that at that time, Paul Keefe was still a small business owner, and so drove his own truck, in this case a rack body model. Lambert said this was prior to Keefe opening his operation in Epping, NH.

Lambert stated that occasionally, Keefe would stop to get fuel for his truck at Rex's station. On the truck would be large drums containing liquids. Lambert recalled that whatever was in the drums would usually leak in the station yard. During conversations, Keefe explained to Lambert that he had picked up the drums at the Portsmouth Naval Shipyard and was taking them to the Coakley Landfill.

My investigation also lead me to Norman Lord, REDACTED - PERSONAL PRIVACY
REDACTED - PERSONAL PRIVACY Mr. Lord is around 78 years of age,

but has a good memory and was generally, "sharp", for his age.

Norman was employed at the Coakley Landfill for a 6 to 8 month time period during the early 1970s. He could not, (nor his wife), pin point the exact year. He was hired to help direct traffic at the site and do other light chores.

Prior to that, Mr. Lord had worked at the Portsmouth Naval Shipyard. He stated that sometime in the late 1960s, Tom Borza, (Pat Coakley's son-in-law), also worked there in another shop.

On one occasion, Lord saw and heard Paul Keefe talking with Borza in one of the shops. He said they were discussing their prior days in the military. Norman believes they were relating to their Navy days. I include this in the report to document that Borza knew Keefe prior to Borza going to work at the Landfill.

Lord remembers that over a month's period, about once a week, Paul Keefe came to the Coakley Landfill with a rack body truck containing about a dozen 55 gallon drums. Norman stated that the driver was definitely Paul Keefe who he knew, and that he had his name on the truck.

Lord states that most of the barrels had the tops cut off. He said that Keefe would tip the barrels, emptying, "dirty looking liquids", into the Landfill. Lord indicated that Keefe would leave with the empty barrels, unless one or more were badly rusted. If so, the barrels were also deposited in the Landfill.

Lord stated that others were also dumping drums at the site. He remembers several service stations bringing in drums of oil and oily rags on a regular basis. (Could not identify specific names)

Eventually, Lord states that Tom Borza put a stop to the dumping of drums. This was because, "the drums were too hard to crush." Lord was present when Borza told Keefe not to bring any more drums to the site. Keefe reportedly was angry, and replied, "We'll see about this." By making that statement, Norman thought that Keefe was probably going to see Coakley to contest the new order. However, during the remainder of the time that Norman worked there, Keefe did not bring in any more drums.

Lord believes that Keefe was most likely bringing in drums prior to his employment at Coakley. However, he had no evidence on which to base this belief. It is important to note that Lord had no idea as to when in the early 1970s, that he worked there.

I am also aware that Paul Keefe owned a rubbish business and at least one packer during the early 1970s, and perhaps prior to that. In the mid 1970s, he sold part of the business and

(3)

truck to Richard Ferguson, his brother-in-law who now lives on Great Bay Road in Greenland, NH. This was, as I understand it, mostly made up of commercial accounts in the City of Portsmouth.

I am in possession of a copy of a United States Air Force document which indicates that in the 1976 to 1977 contact year, Keefe Environmental Services had the sole refuse contract with Pease Air Force Base to do the rubbish removal for the housing areas. Being that Pease was included in the Coakley contract, it is more than likely that this rubbish would have been deposited at the Coakley Landfill.

Between 1977 and 1980, Pease AFB entered into seven different contracts with Keefe Environmental Services, Inc. to remove industrial waste, including solvents, thinners, paint, sludge, oil and oil waste. However, at this time I have not received any information to show that any of these materials were brought to the Coakley Landfill. These may have been taken to Epping.

Speculation made by a number of persons spoken with is that a large amount of industrial waste from Pease AFB was brought to the Coakley Landfill in it's early years of operation. However, no one has been able to give me specific information to substantiate this.

END OF REPORT